

15. Have you had other employment in the past ten years?

If yes, list prior places of employment, address, length of time at each, and job description for each prior employment.

MARITAL STATUS

16. Please check: ☐ married ☐ separated
☐ single ☐ widowed
☐ divorced ☐ living w/non-marital mate

17. If married or with mate, for how long?

Is your spouse or mate currently employed, unemployed, retired, a homemaker, or a student?

18. If employed, please describe what type of work your spouse or mate does, including name and location of employer and length of time at the position.

19. If your spouse or mate is retired, presently unemployed or disabled, please answer the question above for the last job.

20. What is the educational background of your spouse or mate?

008375

21. Does any adult, other than yourself (and your spouse), reside in your household?

If yes, what is his/her relationship to you?

22. What is his/her occupation and place of employment?

CHILDREN

23. Do you have children?

If so, how many, ages, sex, and last grade completed.

24. Their occupations, locations of employment and marital status, if adults.

008376

25. Do your children presently live with you or, if now adults, did they live with you while growing up?

If no, please explain.

26. Have your children been raised by both natural parents?

If no, please explain who raised them and the circumstances.

27. What factors do you think are most likely to have a positive influence on a child's development?

008377

3. What factors do you think are most likely to have a negative influence on a child's development?

RELIGION

29. What is your religious affiliation/denomination, if any?

30. Do you attend a church/temple?

If yes, how frequently?

31. What church/temple attended?

32. Do you participate in other activities in your church/temple?

If yes, please describe them.

008378

FAMILY BACKGROUND

33. Where did you grow up?

34. Do you have siblings?

If yes, please list age, sex, occupation and whether full, half, or step-sibling.

35. What are/were your parent's occupations?

36. Father's birthplace:

Mother's birthplace:

MILITARY SERVICE

37. Have you ever served in the military?

If yes, when, where, how long, branch, highest rank and job.

008379

FIREARMS

38. Do you now own or have you ever owned a firearm?

If yes, what type of firearm and for what purpose did you own it?

39. Have you ever fired a handgun?

If yes, please explain the type of gun and the circumstances under which you fired it.

40. Have you had any bad experiences with guns, such as having one pointed at you?

If yes, please explain.

HEALTH

41. Do you have any specific health problems of a serious nature that might make it difficult or uncomfortable for you to sit as a juror in this case?

If yes, please explain.

42. Are you taking any medication regularly that might make it difficult for you to pay attention or concentrate for long periods of time?

008380

43. Is there any pressing business or personal matter that might interfere with the time it may take to render a decision in this case?

If yes, please describe.

AFFILIATIONS

44. Do you belong to any social, fraternal, recreational, or athletic groups?

If yes, please describe.

45. Offices held now or in the past in any of these groups?

If yes, describe the position and what it involved.

46. Do you belong to any civic or political clubs or organizations?

If yes, please describe.

008381

offices held now or in the past in any of these groups?

If yes, describe the position and what it involved.

48. Do you belong to a union?

If yes, please describe.

49. Offices held now or in the past?

If yes, describe the position and what it involved.

SPARE TIME

50. When you have time, how do you choose to relax and enjoy yourself?

51. What are your hobbies and interests?

52. What television programs do you watch?

008382

53. What type of books do you enjoy reading?

54. Which magazines do you read?

MEDIA

55. Do you get more of your news from (circle one):

- a. newspapers
- b. magazines
- c. radio
- d. TV

56. Which newspapers/news magazines do you read regularly?

57. What news programs do you listen to or watch most often?

58. Do you follow criminal cases or crime stories in the news?

If yes, which cases have you followed?

008383

Do you follow stories about the functioning of the criminal justice system?

If yes, which stories and how do these stories make you feel about the criminal justice system?

JURY EXPERIENCE

60. Have you served as a juror before?

If yes, when and where?

61. Criminal or civil case?

If civil, what was the issue?

If criminal, what type of charge?

62. Were you the foreperson?

63. Without disclosing the result, did the jury reach a verdict in all cases?

If no, describe type of case.

008384

WITNESS EXPERIENCE

64. Have you ever testified as a witness in a criminal or civil case?

If so, what type of case and in what capacity did you testify?

65. Have you ever witnessed a crime or situation calling for your observation?

If yes, please describe when and under what circumstances.

66. In addition, if you ever filed a report with the police, please describe when and under what circumstances.

CRIMINAL RECORD

67. Have you, or a member(s) of your family, or someone close to you, ever been arrested for or charged with a criminal offense?

68. How was this person related to you?

69. Were you (they) convicted?

008385

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VICTIM EXPERIENCE

70. Have you, or any member of your family, or close friend, ever been a victim of a crime?

If yes, who, when and what happened?

71. How has the experience affected your feelings about the criminal justice system?

LITIGATION EXPERIENCE

73. Have you, or any member of your family, or close friend, ever taken a course in the administration of justice, or studied law?

If yes, please give details.

74. Have you, or any member of your family or close friend ever been affiliated with any of the following:

If yes, please check:

- ☐ law enforcement (police officer, sheriff, F.B.I. agent, Etc.)
- ☐ corrections (prison guard, jailer, prison staff, jail staff)
- ☐ mental institution
- ☐ juvenile facilities
- ☐ probation and parole

☐ district Attorney or United States Attorney
☐ public defender
☐ law school
☐ investigative work
☐ immigration services
☐ drug enforcement administration

75. If you checked any of the above, please indicate who was affiliated, the nature of the affiliation, and when.

76. Do you have acquaintances who are attorneys practicing criminal law or judges?

If yes, please state the names of those persons and the relation that you have with them.

PSYCHIATRY/PSYCHOLOGY

77. How do you feel about psychiatrists and/or psychologists testifying as experts in court cases?

78. Are you familiar with psychological testing?

If yes, how do you feel about the validity of these tests?

79. Have you ever studied psychiatry, psychology, or any related subjects?

If yes, please explain.

80. Have you, or any member of your family or close relative, ever consulted a psychiatrist or psychologist for professional services?

81. Did this consultation affect your opinion about the value of psychiatry or psychology?

If yes, please explain.

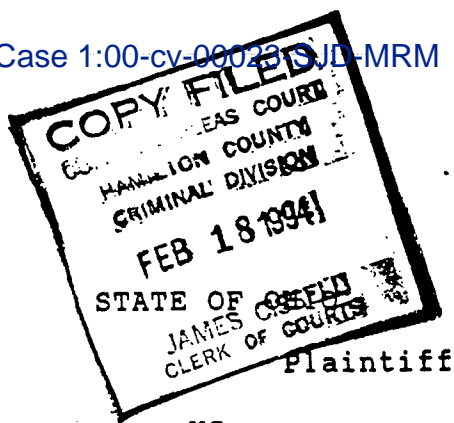
82. Is there anything else you would like to bring to the court's attention about your ability to be fair and impartial?

If yes, please explain.

Date

Signature

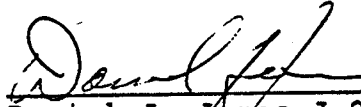
008389



COURT OF COMMON PLEAS
CRIMINAL DIVISION
HAMILTON COUNTY, OHIO

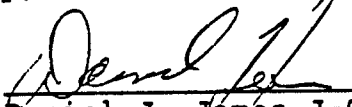
Plaintiff : Case No. B9400481
Judge Morrissey
vs. :
: REQUEST FOR NOTICE OF
: INTENTION TO USE EVIDENCE
LEE MOORE : O.R. Cr. P. 12 (D)(2)
Defendant :

Defendant, having been arraigned, through counsel, hereby requests the Prosecuting Attorney to provide Defendant's Counsel notice of the Prosecuting Attorney's intention to use evidence in chief at the trial, which evidence the Defendant is entitled to discover under O.R. Cr. P. 16, in order that Defendant may raise objections prior to trial under Subsection (B) (3) of O.R. Cr. P. 12.

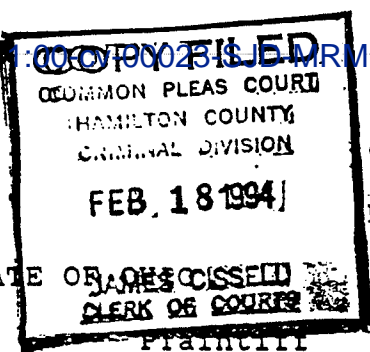

Daniel J. James J-074/0008067
Attorney for Defendant
30 E. Central Pkwy., 13th Flr.
Cincinnati, Ohio 45202
(513) 721-1995

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request For Notice Of Intention To Use Evidence was served upon the Hamilton County Prosecutor, by hand delivery, this 18th day of February, 1994.


Daniel J. James J-074/0008067
Attorney for Defendant

008390



COURT OF COMMON PLEAS
CRIMINAL DIVISION
HAMILTON COUNTY, OHIO

STATE OF OHIO
JAMES C. CISSELL
CLERK OF COURT
Plaintiff

Case No. B9400481
Judge Morrissey

vs.

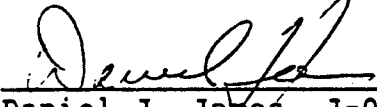
REQUEST FOR BILL OF
PARTICULARS

LEE MOORE

Defendant

Now comes the Defendant herein, by and through counsel, pursuant to Criminal Rule 7(E), and requests the Prosecutor to provide a Bill of Particulars in the above captioned case, setting forth the following information.

- A. The exact time, date and locations of the offenses that are alleged to have occurred.
- B. The specific nature of the offenses charged.
- C. The names and addresses of all individuals who were present at all or any of the times that the alleged offenses took place.
- D. The exact nature of the conduct alleged to have been engaged in by Defendant at the time the alleged offenses took place.

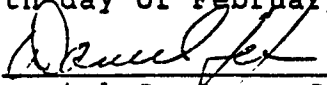

Daniel J. James J-074/0008067
Attorney for Defendant
30 E. Central Pkwy., 13th Flr.
Cincinnati, Ohio 45202
(513) 721-1995

MEMORANDUM

Ohio Rules of Criminal Procedure Rule 7(E).

CERTIFICATION

This is to certify that a copy of the above Motion has been served upon the Hamilton County Prosecutor, 4th floor of the Hamilton County Courthouse, this 18th day of February, 1994.


Daniel J. James J-074/0008067
Attorney for Defendant

008391

COURT OF COMMON PLEAS
CRIMINAL DIVISION
HAMILTON COUNTY, OHIO

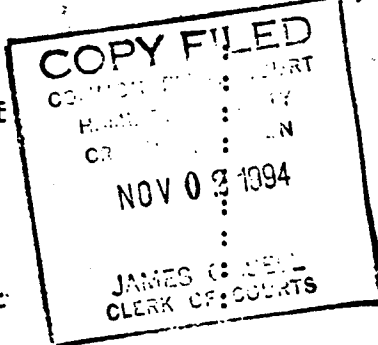
STATE OF OHIO

Plaintiff

vs.

LEE MOORE

Defendant



Case No. B9400481
Judge Morrissey

MOTION TO SET ASIDE ENTRY
APPOINTING COURT
PSYCHIATRIC CENTER
FOR EXAMINATION

Comes now the Defendant, LEE MOORE, by and through his attorneys, and requests this court to void and set aside the Entry Appointing Court Psychiatric Center For Examination entered herein on August 22, 1994, a copy of which is attached hereto and marked as "Exhibit A".

In support of the request, the Defendant states that the Entry filed and marked as "Exhibit A" was filed by the court at the court's own discretion. Defense counsel has never requested an examination as ordered in this Entry, nor did defense counsel review or argue the substance of this Entry, nor did counsel for the Defendant review, approve or sign this Entry.

WHEREFORE, the Defendant requests this Entry be set aside.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Daniel J. James".

Daniel J. James #0008067
Attorney for Defendant
30 E. Central Pkwy., 13th Flr.
Cincinnati, Ohio 45202
513-721-1995

and

Timothy J. Deardorff by DII
Timothy J. Deardorff #0006308
Attorney for Defendant
2368 Victory Parkway
Suite 300
Cincinnati, Ohio 45206
513-872-7900

MEMORANDUM

In support of this request, the Defendant states that on August 4, 1994, a Motion For Appointment Of Psychologist To Assist In Preparation Of Defense was filed on behalf of the Defendant. Pursuant to this request, Dr. David Chiappone of the Community Diagnostic and Treatment Center was appointed "to assist the defense in this proper presentation of both phases of trial herein". This appointment was pursuant to an Entry signed by the court and counsel for both the State and the Defendant and filed on August 12, 1994, a copy of which is attached hereto and marked "Exhibit B". In accordance with this Entry, Dr. Chiappone is now in the process of interviewing the Defendant and assisting the defense. As such, Dr. Chiappone is a defense witness.

There is no authority for the appointment of the Court Psychiatric Center to assist the court as specified in the Court's Entry marked "Exhibit A". As such, this Entry is improper and the request for a report in writing is improper.

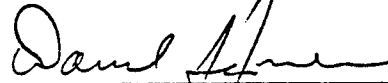
A mental evaluation of the Defendant may only be ordered upon request of the Defendant prior to sentencing.

"A pre-sentence investigation or mental examination shall not be made except upon the request of the defendant."

(ORC Section 2929.03(D)(1))

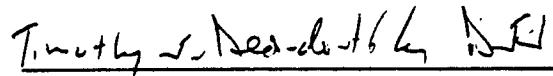
No finding of guilt has been made and this case has not proceeded to the sentencing phase. The Defendant has not requested a mental examination and it is improper to require Dr. Chiappone to prepare a written report concerning his contact with the Defendant as ordered in the Entry marked "Exhibit A". The Defendant requests that the Court's Entry as stated in "Exhibit A" shall be set aside and declared null and void.

Respectfully submitted,



Daniel J. James #0008067
Attorney for Defendant
30 E. Central Pkwy., 13th Flr.
Cincinnati, Ohio 45202
513-721-1995

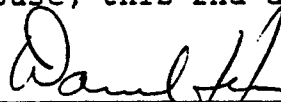
and



Timothy J. Deardorff #0006308
Attorney for Defendant
2368 Victory Parkway
Suite 300
Cincinnati, Ohio 45206
513-872-7900

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing Motion was hand delivered to the office of the Hamilton County Prosecutor, 4th floor of the Hamilton County Courthouse, this 2nd day of November, 1994.



Daniel J. James #0008067
Attorney for Defendant